

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(lead case)

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

No. 25-cv-449 (LJL) (member case)

**DECLARATION OF MICHAEL J. GOTTLIEB IN SUPPORT OF BLAKE LIVELY'S
MOTION FOR SANCTIONS AGAINST DEFENDANTS' COUNSEL**

I, Michael J. Gottlieb, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Willkie Farr & Gallagher LLP, 1875 K Street NW Washington, DC 20006 and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Motion for Sanctions Against Defendants' Counsel.

3. I submit this declaration to place before the Court true and correct copies of the following documents.

4. A true and correct copy of a non-exhaustive list of public statements made by Bryan Freedman ("Freedman") prior to February 3, 2025 regarding the instant case and Ms. Lively, filed on January 21, 2025 at ECF No. 17-2, is attached hereto as **Exhibit A**.

5. A true and correct copy of a certified transcript of Freedman's February 5, 2025 interview on the podcast *2 Angry Men* is attached hereto as **Exhibit B**.

6. A true and correct copy of a certified transcript of Freedman's February 18, 2025 interview on the podcast *Hot Mics with Billy Bush* is attached hereto as **Exhibit C**.

7. A true and correct copy the TMZ article, dated February 19, 2025, entitled *Justin Baldoni's Attorney Blake's Amended Suit is 'Hearsay' . . . Where's the Evidence?* is attached hereto as **Exhibit D**.

8. A true and correct copy of the People magazine article, dated March 19, 2025, entitled *Justin Baldoni's Lawyer Accuses Ryan Reynolds of Trying to 'Run from the Flames' in Asking to Be Dismissed from Lawsuit* is attached hereto as **Exhibit E**.

9. A true and correct copy of the TMZ article, dated March 20, 2025, entitled *Justin Baldoni Lawyer Blake Is Abusing The Legal System!!! Slams Her Motion To Dismiss Lawsuit* is attached hereto as **Exhibit F**.

10. A true and correct copy of the TMZ article, dated April 4, 2025, entitled *Blake Lively To Justin Baldoni Mr. 'I Support Victims' Is Trying To Silence One!!! The Law Won't Let Him* is attached hereto as **Exhibit G**.

11. A true and correct copy of the People magazine article, dated April 4, 2025, entitled *Justin Baldoni Files Response to Blake Lively's Motion to Dismiss His Countersuit: 'We Will Continue to Fight,' Lawyer Says* is attached hereto as **Exhibit H**.

12. A true and correct copy of the People magazine article, dated May 8, 2025, entitled *Justin Baldoni's Lawyer Wants to Sell Tickets to Blake Lively's Deposition for This Reason (Exclusive)* is attached hereto as **Exhibit I**.

13. A true and correct copy of Freedman's June 10, 2025 interview with TMZ is attached hereto as **Exhibit J**.

14. A true and correct copy of the certified transcript of Freedman's June 11, 2025 interview with Megyn Kelly is attached hereto as **Exhibit K**.

15. A true and correct copy of an email produced by Jamey Heath in this litigation, bearing the Bates Stamp HEATH_000028186, is attached hereto as **Exhibit L**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 4, 2025

/s/ Michael J. Gottlieb

WILLKIE FARR & GALLAGHER LLP
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com